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Attorneys for Defendant Tony Daniel Klein

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

TONY DANIEL KLEIN,

DEFENDANT.

No. 3:22-cr-00084-SI-1

**DEFENDANT'S AMENDED PROPOSED
WITNESS LIST**

Defendant hereby submits the following amended list of witnesses it may call to testify in the above-captioned matter, beginning July 10, 2023. The Defendant respectfully requests the opportunity to amend this list, both to add or subtract witnesses, as may be necessary throughout trial.

1. Andrea Sang
2. Jill Bird
3. Tiffany Harrison
4. Celia Nash
5. Teresa Gillette
6. Nicole Navarre
7. Constantine Alleyne
8. Sarah Rodgers
9. Deborah Beaver, aka Deborah Reinhardt
10. Jennifer Cox, aka Jennifer Allen
11. Mark Olson
12. Gina Melise

Defendant also intends to call the following people as witnesses, who are also listed as Government Witnesses.

13. Caryn Ackerman, FBI
14. Wendy Armitage, CCCF Staff
15. Erik Becker, CCCF Staff
16. Elizabeth Bowditch, FBI
17. Dave Bowman, Investigator with Board of Nursing
18. Mike Brasch, CCCF Nursing Staff
19. Chad Drew, OSP
20. Erin Greiner Flindt, FBI

21. Teresa Hannon, CCCF Nursing Staff
22. Eric Hiser, FBI
23. Dane Koznek, CCCF Nursing Staff
24. Roslyn Lamb, CCCF Corrections Staff
25. Marie Merten, CCCF Corrections Staff
26. Lindsay Noack, CCCF Corrections Staff
27. Kristina Russo, former AIC at CCCF
28. Liz Sabin, CCCF Nursing Staff
29. Erick Sage, PREA coordinator ODOC
30. Marylou Ward, CCCF Correctional Staff
31. Erin Magee, FBI

Respectfully submitted on July 4, 2023

/s/Matthew G. McHenry

Matthew G. McHenry
Counsel for Tony Klein

/s/Amanda Alvarez Thibeault

Amanda Alvarez Thibeault
Counsel for Tony Klein